

MICHAEL A. BURKE, Esq., NV Bar No. 11527
ROBISON, SHARP, SULLIVAN & BRUST

71 Washington Street
Reno, NV 89503
Telephone: (775) 329-3151
Facsimile: (775) 329-7941

TODD BOLEY, CA Bar No. 68119
LAW OFFICES OF TODD BOLEY

2831 Mariner Square Dr., Ste 280
Alameda, CA 94501
Telephone: (510) 836-4500
Facsimile: (510) 649-5170
(admitted *Pro Hac Vice*)

PETER W. ALFERT, CA Bar No. 83139
LAW OFFICES OF PETER ALFERT, PC

909 Marina Village Parkway #199
Telephone: (925) 279-3009
Facsimile: (925) 279-3342
(admitted *Pro Hac Vice*)
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TAMMARA TIMS and H.H., a minor by and
through his Guardian Ad Litem, GENEVA
ATTEBERRY

Plaintiffs,

v.

CLARK COUNTY SCHOOL DISTRICT,
KASEY GLASS, MARK CONNORS, and
DOES 1-50,

Defendants.

Case No. 2:18-cv-00021-JAD-VCF

**STIPULATION AND ORDER FOR CCSD
TO IDENTIFY NAME AND MOST
CURRENT CONTACT INFORMATION
OF PARENTS AND PRODUCE VIDEO
AND DOCUMENTS, IF ANY,
PURSUANT TO FAMILY EDUCATION
RIGHTS AND PRIVACY ACT
("FERPA"), 20 U.S.C. §1232G**

1 **IT IS HEREBY STIPULATED AND AGREED** by and between undersigned counsel
2 for Plaintiffs and undersigned counsel for Clark County School District (hereinafter "CCSD")
3 that CCSD shall produce the name of the minor student and the names and most current contact
4 information of the parents/guardians of the CCSD student who was identified by Kelsey Wilhere
5 Lynch during her deposition on September 21, 2018 as having an inappropriate interaction with
6 KASEY GLASS in the Multipurpose Room on a date prior to March 15, 2017. CCSD shall also
7 produce video surveillance footage and writings concerning this interaction, if any exist.

8 **IT IS FURTHER HEREBY STIPULATED AND AGREED** that the disclosure of
9 such information will be subject to the Stipulated Confidentiality Agreement and Protective
10 Order entered on May 1, 2018, as the identities of the student and the student's parents who are
11 not a party to this case may be protected by the Family Education Rights and Privacy Act
12 ("FERPA"), 20 U.S.C. §1232g.

13 **IT IS FURTHER HEREBY STIPULATED AND AGREED** that CCSD shall have 10
14 days from the date of this order to produce the above information, to allow CCSD sufficient time
15 to provide notice to the affected individuals and an opportunity to object to the disclosure of their
16 personal identifiable information.

17 **IT IS FURTHER HEREBY STIPULATED AND AGREED** that if any individual
18 objects to the disclosure of their personal information, that individual must file an appropriate
19 document with the court within 7 days of receipt of notice of this Order. The Court will then
20 make a determination regarding the validity of the objection and whether such information will
21 be disclosed at its earliest convenience.

22 **IT IS SO STIPULATED.**

23 Dated: October 18, 2018

ROBISON, SHARP, SULLIVAN & BRUST

25 By: /s/ Michael A. Burke
26 MICHAEL A. BURKE
27 Attorney for Plaintiffs
28

1 Dated: October 18, 2018

LAW OFFICES OF PETER ALFERT, PC

2 By: /s/ Peter W. Alfert
3 Peter W. Alfert
4 Attorney for Plaintiffs
Admitted Pro Hac Vice

5 Dated: October 18, 2018

LAW OFFICES OF TODD BOLEY

6 By: /s/ Todd A. Boley
7 Todd Boley
8 Attorney for Plaintiffs
9 Admitted Pro Hac Vice

10 Dated: October 18, 2018

GREENBERG TRAURIG, LLP

11 By: /s/ Kara Hendricks
12 MARK E. FERRARIO
13 KARA B. HENDRICKS
14 WHITNEY L. WELCH-KIRMSE
Attorneys for Defendants,

15
16 **ORDER**

17
18 **IT IS SO ORDERED.**

19
20 Dated: 10-19-2018


UNITED STATE MAGISTRATE JUDGE